

ORIGINAL

INTERVENTION



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BEFORE THE ARIZONA CORPORATION C
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COMMISSIONERS

GARY PIERCE, Chairman
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP
BRENDA BURNS

2012 AUG -3 P 1:44

ARIZONA CORPORATION COMMISSIONERS
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF
BLUE JAY WIRELESS, LLC
FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE
STATE OF ARIZONA.

DOCKET NO. T-20853A-12-0316

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105 the Arizona Local Exchange Carriers Association
("ALECA") hereby moves to intervene in the above-captioned case.

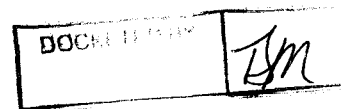
I Service

Please serve all documents on:

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Craig.Marks@azbar.org
Attorney for ALECA

Arizona Corporation Commission
DOCKETED

AUG 03 2012



II Interest in Proceeding

ALECA is comprised of small telephone companies and member-owned cooperatives,
all of which are providing local exchange telecommunications services to customers in rural,
high cost areas of Arizona, and all of which are "rural telephone companies" as defined by the
Communications Act of 1934, as amended (the "Act") 47 U.S.C. 0 153(37). ALECA's members
are:

- Fort Mojave Telephone Company;
- Frontier Communications Corporation;
- Gila River Telecommunications, Inc.;

- 1 • Hopi Telecommunications, Inc.;
- 2 • Midvale Telephone Exchange, Inc.;
- 3 • San Carlos Apache Telecommunications Utility, Inc.;
- 4 • South Central Communications;
- 5 • Table Top Telephone Company, Inc;
- 6 • TDS;
- 7 • Tohono O'odham Utility Authority; and
- 8 • Valley Telephone Cooperative; and
- 9 • Zona Communications.¹

10 Each ALECA member, including its Tribally-owned members, receives support from the
11 Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides
12 discounted Lifeline telephone service and receives compensation for the discounts from the
13 FUSF. Blue Jay Wireless, LLC. ("Blue Jay") seeks designation as an Eligible
14 Telecommunications Carrier ("ETC") so that it may provide Lifeline wireless telephone service
15 to eligible customers in Arizona.

16 ALECA is concerned that Blue Jay's proposed service request may raise jurisdictional
17 issues concerning the provision of services on tribal lands. ALECA is also concerned that Blue
18 Jay's Lifeline offering may unfairly duplicate the similar offerings of its member companies,
19 cause the FUSF requirements to grow to the point where its member companies' FUSF
20 compensation is endangered, and undermine public support for the FCC's universal service
21 programs.

22 ALECA reserves the right to take positions on any other issues in this case.

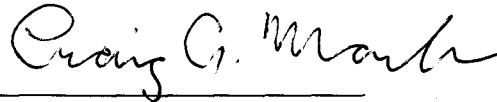
23 No other party can adequately represent ALECA's interests.

24 **III Requested Relief**

25 ALECA asks that the Commission grant its Motion to Intervene.

¹ Fort Mohave Telecommunications, Gila River Telecommunications, Hopi Telecommunications, San Carlos Apache Telecommunications Utility and the Tohono O'odham Utility Authority are tribally-owned telephone Companies, which are not subject to the jurisdiction of the Arizona Corporation Commission.

1 RESPECTFULLY SUBMITTED on August 3, 2012.

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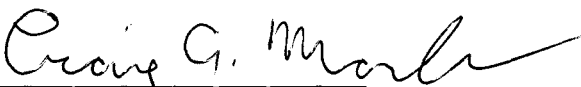
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15 **Original and 13 copies filed**
16 on August 3, 2012, with:

17
18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
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22

23 **Copy of the foregoing e-mailed**
24 on August 3, 2012, to:

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